

California Natural Products

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August 8, 2005

Arthur Neal
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National Organic Program
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. California Natural Products supports the continued allowance of the following substance(s):

Name of Substance	Location on National List (ie. 205.605(a))	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Acids – Alginic, Citric & Lactic	205.605 a	Widely used in processed foods, not commercially available organic	Previous NOSB assessment still relevant
Calcium Chloride	205.605 a	Widely used in processed foods and in manufacture of ingredients for processed foods, not commercially available organic.	Previous NOSB assessment still relevant

Dairy cultures	205.605 a	Widely used in processed foods, not commercially available organic, especially in the variety necessary to produce consumer acceptable foods	Previous NOSB assessment still relevant
Enzymes	205.605 a	Widely used in production of ingredients and processed foods, not commercially available organic, a large proportion of the finished foods that use ingredients produced with enzymes will no longer be available as organic.	Previous NOSB assessment still relevant
Flavors	205.605 a	Widely used in processed foods, not generally commercially available organic, with a few exceptions, especially in the variety necessary to produce consumer acceptable foods	Previous NOSB assessment still relevant
Carbon Dioxide	205.605 b	Widely used in processed foods and grains, not commercially available organic	Previous NOSB assessment still relevant
Chlorine materials	205.605 b	Virtually necessary for most processed foods, not commercially available organic, used with strict limitations that preserve the organic integrity of the food	Previous NOSB assessment still relevant

		and the process	
Hydrogen Peroxide	205.605 b	Widely used in processed foods – shelf stable beverages and soups will be eliminated without this ingredient, not commercially available organic	Previous NOSB assessment still relevant
Silicon dioxide	205.605 b	Widely used in processed foods as a necessary flow agent, not commercially available organic	Previous NOSB assessment still relevant
Tocopherols	205.605 b	Widely used in processed foods, not commercially available organic	Previous NOSB assessment still relevant
The rest of 205.605 in its entirety	205.605 (a) & 205.605 (b)	Virtually every organic input we use, and virtually every customers product that our ingredients go into requires several of these items. We may not use them but without them organic ingredients will not be available to us, and our customers will not be able to produce their products organically.	Previous NOSB assessment still relevant
The entire 205.601	205.601	Availability of the organic agricultural inputs we process into ingredients and finished goods would be severely curtailed without these necessary tools.	Previous NOSB assessment still relevant

California Natural Products has been one of the pioneers in producing organic processed foods both in the form of organically certified and organic compatible ingredients, as well as finished organically certified consumer products. As such we understand well the role many of these National List items play in allowing the production of organically certified processed foods.

California Natural Products supports and endorses the NOSB and their process for evaluating the appropriateness of the approved National List ingredients from the perspectives of:

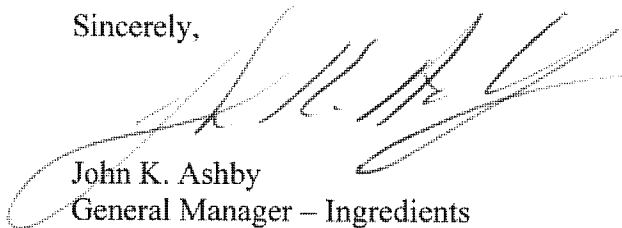
1. Are there adverse impacts on humans or the environment during manufacture, use and or disposal of the ingredient in question?
2. Is the substance essential for organic production?
3. Is the substance compatible with organic production practices?

As the situation for virtually all of the ingredients specifically mentioned above has not substantially changed since the original NOSB approval process, it is imperative that these items be continued until a thorough review process determines that the answers to the above questions have changed enough to warrant consideration of removal of a specific item from the list.

Otherwise the demand for organic agriculture will be severely impacted with a substantial reduction in organic crops grown, dramatic reduction in availability of consumer processed organic food products, and a loss of the growing organic export market (both agricultural commodities as well as finished consumer foods).

California Natural Products strongly supports the retention of the materials on the National List.

Sincerely,



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Cc: Organic Trade Association
National Organic Standards Board